

U.S. ENVIRONMENTAL PROTECTION AGENCY  
 POLLUTION/SITUATION REPORT  
 South Dayton Dump Site - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
 Region V

**Subject:** **POLREP #2**  
**Progress (PRP lead)**  
**South Dayton Dump Site**

**Moraine, OH**  
**Latitude: 39.7240309 Longitude: -84.2187749**

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**From:** Steven Renninger, On-Scene Coordinator

**Date:** 1/22/2014

**Reporting Period:** July 23 through January 13, 2014

**1. Introduction**

**1.1 Background**

<b>Site Number:</b>	B52B	<b>Contract Number:</b>	
<b>D.O. Number:</b>		<b>Action Memo Date:</b>	10/9/2012
<b>Response Authority:</b>	CERCLA	<b>Response Type:</b>	PRP Oversight
<b>Response Lead:</b>	EPA	<b>Incident Category:</b>	Removal Action

<b>NPL Status:</b>	Non NPL	<b>Operable Unit:</b>	OU3 and OU4
<b>Mobilization Date:</b>	6/20/2013	<b>Start Date:</b>	6/20/2013
<b>Demob Date:</b>		<b>Completion Date:</b>	
<b>CERCLIS ID:</b>		<b>RCRIS ID:</b>	
<b>ERNS No.:</b>		<b>State Notification:</b>	Ohio EPA notified
<b>FPN#:</b>		<b>Reimbursable Account #:</b>	

### 1.1.1 Incident Category

PRP Oversight

### 1.1.2 Site Description

The SDDL Site is a former industrial landfill located at 1975 Dryden Road in Moraine, Ohio. It encompasses a total of 80 acres, 65 of which contain landfilled waste. Approximately 40 acres of the landfill has been built over and/or is being used for other commercial/industrial purposes. The Site operated from the early 1940s to 1996 and is a filled sand and gravel pit and contains household waste, drums, metal turnings, fly ash, foundry sand, demolition material, wooden pallets, asphalt, paint, paint thinner, oils, brake fluids, asbestos, solvents, transformers and other industrial waste. As the excavated areas of the Site were filled, some of the property was sold and/or leased to businesses including Valley Asphalt and other businesses along Dryden Road and East River Road. The Miami Conservancy District owns the southern part of the site including part of the large quarry pond.

#### Site Background – 1946 thru 1996 Landfill Operations

Disposal of waste materials began at the Site in the early 1940s. Materials dumped at the Site included drummed wastes. Known hazardous substances were disposed at the Site, including drums containing hazardous waste from nearby facilities. Some of the drums contained cleaning solvents (1,1,1-trichloroethane ["TCA"]; methyl ethyl ketone ["MEK"]; and xylene); cutting oils; paint; stoddard solvents; and machine-tool, water-based coolants. The Site had previously accepted materials including oils, paint residue, brake fluids, chemicals for cleaning metals, solvents, etc. Large quantities of foundry sand and fly ash were dumped at the Site.

A timeline of the Site history is presented below.

- During the 1930s, excavation activities began according to the aerial photographs.
- In 1940, landfill operations initiated at the Site.
- In the mid 1950s, buildings were constructed on the portions of the Site adjoining Dryden Road and businesses reportedly began operation.
- In approximately 1956, Valley Asphalt began operations on the northern part of the site.
- In 1969, the Montgomery County Health Department (MCHD) first licensed the Site as a solid waste disposal facility permitted to accept commercial and industrial wastes.
- In 1974, the Ohio EPA took over the authority for annual licensing; however, the licenses continued to be issued by and overseen by MCHD on behalf of Ohio EPA. The last license granted by Ohio EPA was issued in 1986.
- As of 1987, the Site's Permit limited materials for disposal to construction and demolition debris.
- In 1990, the Site stopped accepting and disposing of fly ash at the Site.
- In early 1996, the Site closed.

#### Site Background – Remedial Investigation/Feasibility Study

EPA conducted a screening site inspection of the Site in 1991 and a focused site inspection prioritization site evaluation in 1995. Ohio EPA conducted a site team evaluation prioritization of the landfill in 1996.

In 2000, Valley Asphalt removed several drums and 2,217 tons of contaminated soils from their property (northern area of the Site) that was uncovered when a sewer line was being excavated. EPA proposed the site to the National Priorities List in 2004.

In 2006, several potentially responsible parties (PRPs) for the Site agreed to conduct further studies and evaluate cleanup options at the Site under a Remedial Investigation/Feasibility Study (RI/FS). The

RI/FS is being conducted under an Administrative Settlement Agreement and Order on Consent with EPA. In 2008, the PRPs agreed to conduct a streamlined RI/FS at the site. EPA approved these work plans, and the PRPs conducted several investigations at the site from 2008 through 2010.

The 2008-2010 investigations included geophysical surveys, test pit and test trench sampling, vertical aquifer sampling, landfill gas sampling and groundwater monitoring well installation and sampling. The groundwater contamination (above MCLs) along the eastern boundary of the Site (Dryden Road) included TCE, vinyl chloride, cis-1,2-dichloroethene (cis-1,2-DCE), benzene, arsenic and lead.

Preliminary groundwater elevation monitoring and mapping conducted by the PRPs in 2008-2009 indicated groundwater flow direction in the vicinity of the Site was variable. During the July 2008 to December 2008 monitoring events, groundwater flow appeared to be generally to the west, with occasional components of flow to the northwest and southwest.

In 2009 and 2010, the PRPs conducted soil vapor sampling at 9 gas probes on Site. Soil gas/vapor sampling showed TCE levels greater than the ODH sub-slab TCE screening level of 20 parts per billion by volume (ppbv), with a high TCE concentration of 10,420 ppbv in GP20-09.

Operable unit one (OU1) would involve evaluating cleanup alternatives to address 55 acres of the landfill, and would include cleanup alternatives that would allow on-site business to remain safely operating at the site.

The PRPs are also conducting a vapor intrusion study, to evaluate whether landfill chemicals are posing immediate threats to the on and near-site businesses. Sampling conducted in January and March 2012 indicated that TCE and/or methane levels greater than the ATSDR and ODH TCE sub-slab and indoor air screening levels were observed in five on-Site non-residential buildings.

#### Site Background – Remedial Program Request for Removal Assistance

In a letter dated June 5, 2012, EPA RPM Karen Cibulskis requested EPA Emergency Response Branch assistance to determine if the Site met the criteria for a time-critical removal action. The letter requested removal assistance in evaluating EPA's options for addressing current and potential vapor intrusion risks at the Site, including whether Removal authority could be appropriately used to implement mitigation measures to address all or some of the current and threatened risks posed by VOCs (primarily TCE) in sub-slab soil gas at 12 commercial/industrial buildings built over the landfill, and at an adjacent commercial/industrial building. PRP Vapor intrusion sampling in January and March 2012 has shown TCE sub-slab vapor levels as high as 5,582 ppbv and TCE indoor air vapor levels as high as 13 ppbv, a documented completed exposure pathway.

At the occupied building located at 2031 Dryden Road, methane was detected in a laboratory sub-slab sample at 0.97%, which exceeds the ODH sub-slab methane screening level of 0.5%.

In Building 2 located at 1903 Dryden Road, which is used for storage, methane was detected in a laboratory sub-slab sample above 100% of the LEL (sample concentration 6.6% methane by volume). Building 2 is currently closed to access.

#### Site Background – Ohio Department of Health

On July 6, 2012, the ODH provided health-based guidance to evaluate the results of Vapor Intrusion sub-slab and indoor air sampling for contaminants of concern at the Site. ATSDR and ODH identified residential and non-residential sub-slab and indoor air screening levels. The screening levels are based on  $10^{-5}$  cancer risk or a Hazard Index of 1.0 and generally used at remedial sites. ODH also provided  $10^{-4}$  screening levels for time-removal action evaluation.

#### Site Background – Ohio EPA Request for Removal Assistance

In a letter dated July 17, 2012, the Ohio EPA expressed concerns about the risk to human health from indoor air exposure to VOCs and the risk of explosive conditions from landfill gas. Ohio EPA views the Site as a threat to the on-Site and surrounding businesses and residences, and supports the Remedial

branch's request for assistance from the Removal branch in evaluating options for addressing current and potential vapor intrusion risks at the SDDL Site.

#### **1.1.2.1 Location**

The Site is located at 1901 through 2153 Dryden Road and 2225 East River Road in Moraine, Ohio. The Site's geographic coordinates (based on the address of 1975 Dryden Road) are 39° 43' 42.6354" North latitude and 84° 12' 59.8278" West longitude. The Site is bounded to the north and west by the Miami Conservancy District floodway (part of which is included in the definition of the Site), the Great Miami River Recreational Trail and the Great Miami River beyond. The Site is bounded to the east by Dryden Road with light industrial facilities beyond, to the southeast by residential and commercial properties along East River Road with a residential trailer park beyond, and to the south by undeveloped land with industrial facilities beyond.

Approximately 25,060 people live within a 4-mile radius of the Site. Six single-family residences are located on the northwest side of East River Road and are adjacent to the southeast boundary of the Site. A seventh single family home is located on the southeast side of East River Road and is within 300 feet of the Site. A trailer park with several residences is also situated approximately 300 feet southeast of the Site at the southeast intersection of Dryden Road and East River Road.

Part of the landfill is within the 100 year floodway and more than half of the landfill is within the 100 year floodplain. The landfill is within a secondary wellhead protection area and there is a well (not used for drinking water) in the northern part of the landfill. The Site also contains a federally designated wetland. Some of the landfilled materials are below the water table and are in direct contact with groundwater.

#### **1.1.2.2 Description of Threat**

A release of hazardous substances, pollutants, or contaminants is present due to documented vapor intrusion at the SDDL Site. A completed exposure pathway exists for vapor intrusion, as TCE has been documented in the groundwater (TCE as high as 260 ppb), in the soil gas (TCE as high as 10,420 ppbv), in the sub-slab (TCE as high as 17,000 ppbv) and in the indoor air (TCE as high as 50 ppbv). Vapor intrusion is occurring at the Site.

In addition, a second completed exposure pathway exists for vapor intrusion, as benzene has been documented in the sub-slab (at 50 ppbv) and in the indoor air (at 2.4 ppbv) at one on-Site non-residential property.

Sub-slab sampling has documented a methane level of 6.6% in one non-residential property on Site. Methane is explosive between 5% and 15%.

#### **1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results**

Between July 12 and August 8, 2012, EPA conducted a Removal Site Investigation at the Site including residential and non-residential sub-slab sampling and the installation of soil gas vapor probes along the Site's eastern perimeter.

## **2. Current Activities**

### **2.1 Operations Section**

#### **2.1.1 Narrative**

Vapor intrusion sampling results from 2012 by EPA and the PRPs have documented vapor intrusion is occurring at the Site. Five non-residential buildings have shown sub-slab TCE concentrations greater than the ODH sub-slab screening level (as high as 17,000 ppbv) and indoor air TCE concentrations greater than the ODH indoor air screening level of 2 ppbv (as high as 50 ppbv). One non-residential building has shown a sub-slab benzene concentration (50 ppbv) greater than the ODH sub-slab screening level (20 ppbv) and an indoor air benzene concentration (2.4 ppbv) greater than the ODH screening level (2 ppbv). One non-residential building has shown a crawl space PCE concentration at

38 ppbv which exceeds the ODH indoor air PCE screening level of 25 ppbv. Vapor intrusion has been documented to be occurring at this Site. In addition, one non-residential building has shown a sub-slab methane level of 6.6%. Methane is explosive between 5% and 15%.

EPA has documented methane levels using field screening and soil gas samples in GP-2 (12-foot and 16-foot depths) ranging from 2.5% to 24.1%. These results are greater than the ODH sub-slab methane screening level of 0.5% and Ohio EPA's perimeter regulatory level of 5% (lower explosive limit). GP-2 is located off-Site, on the eastside of Dryden Road and adjacent to a DP&L building.

For purposes of managing the time-critical removal action, the Site will be segregated into 2 operating units.

Operating Unit 3 (OU3) will encompass removal work south of the Valley Asphalt Corporation property.

Operating Unit 4 (OU4) will encompass removal work on the Valley Asphalt Corporation property.

On May 1, 2013, EPA conditionally approved the Vapor Intrusion Mitigation Work Plan for on-site commercial buildings. The Work Plan was prepared by CRA pursuant to an AOC signed on April 5, 2013.

On May 21, 2013, EPA conditionally approved the Vapor Intrusion Mitigation Work Plan for on-site properties owned by Valley Asphalt. The Work Plan was prepared by Bowser-Morner pursuant to a UAO issued on March 22, 2013.

In July, 2013, PRPs initiated vapor intrusion mitigation at numerous locations at the Site. EPA is providing oversight of the removal activities.

## **2.1.2 Response Actions to Date**

### OU3 work:

#### Month of July 2013:

On July 25, 2013, EPA, Ohio EPA, START and the Respondents participated in a conference call regarding the status of VI mitigation activities.

The Respondent's sub-slab depressurization system (SSDS) installation contractor (Environmental Doctor) continued SSDS installation activities at 2215 East River Road (Building 24 - Globe Equipment) and at 1951 Dryden Road (Building 8 - B&G Equipment). The systems in both buildings were installed and operating, but compliance port vacuum readings (in July) did not display a full radius of influence on the entire footprints of either building. The Respondents to evaluate options to improve system operation with the Environmental Doctor.

The Respondents continued weekly methane, carbon dioxide, oxygen, LEL, and photoionization detector (PID) readings from soil gas probe GP-2, the soil gas probes located on the western side of Dryden Road (across from GP-2) and from Valley Asphalt Parcel 5054 Building 2 at 1903 Dryden Road, and SIM Trainer Parcel 5173 Building 1 at 2031 Dryden Road.

#### Month of August 2013:

On August 1, 8, 15, 22 and 29, 2013, EPA, Ohio EPA, START and the Respondents participated in conference calls regarding the status of VI mitigation activities. During the conference calls, the participants reviewed the methane field readings from EPA soil gas probe GP-2. Based on the field readings, methane values greater than the LEL of 5 percent that were measured at GP-2 appear to be a seasonal issue, with the greatest readings recorded in July. Methane does not appear to be leaving the Site, and the elevated methane readings at GP-2 do not appear to be a Site-related issue.

During the conference call held on August 22, 2013, EPA proposed hybrid proficiency sampling in cases where system completion and compliance was not demonstrated by vacuum readings alone. Hybrid proficiency sampling would include sub-slab (SS) probe sampling with a focus on heavily occupied spaces, in addition to indoor air (IA) proficiency sampling.

Environmental Doctor completed SSDS installation activities at 2215 East River Road (Building 24 - Globe Equipment) and at 1951 Dryden Road (Building 8 - B&G Equipment). The systems in both

buildings were installed and operating, but compliance port vacuum readings (in July and August) did not display a full radius of influence on the entire footprints of either building. Environmental Doctor to evaluate options to improve system operation.

The Respondents continued weekly methane, carbon dioxide, oxygen, LEL, and PID readings from soil gas probe GP-2, the soil gas probes located on the western side of Dryden Road (across from GP-2) and from Valley Asphalt Parcel 5054 Building 2 at 1903 Dryden Road, and SIM Trainer Parcel 5173 Building 1 at 2031 Dryden Road.

#### Month of September 2013:

On September 5, 12 and 19, 2013, EPA, Ohio EPA, START and the Respondents participated in conference calls regarding the status of VI mitigation activities.

On September 11 and 12, 2013, the Respondents completed 30-day hybrid proficiency sampling at Building 24 (Globe Equipment) and Building 8 (B&G Equipment). The Respondents collected 5 indoor air (IA) and one SS sample at Building 24 and 4 IA and 2 SS samples from Building 8.

Hybrid proficiency sampling results at Building 24 (Globe Equipment) did not show SS or IA concentrations greater than ODH screening levels. An independent SS sample collected by EPA did not show SS concentrations exceeded ODH screening levels.

Hybrid proficiency sampling results at Building 8 (B&G Equipment) showed IA chemical concentrations less than ODH screening levels, but the two SS samples showed TCE concentrations at 290 and 780 ppb, which exceed the ODH TCE screening level of 20 ppb. Environmental Doctor to install three additional extraction points. Once completed, the Respondents will collect another round of sampling.

On September 30, 2013, the Environmental Doctor completed installing the SSDSs in Building 12, occupied by S&J Precision and Overstreet Painting, located at 2015/2019 Dryden Road and in Building 9 (B&G Trucking - Building 2).

The Respondents continued weekly methane, carbon dioxide, oxygen, LEL, and PID readings from soil gas probe GP-2 and from SIM Trainer Parcel 5173 Building 1 at 2031 Dryden Road. The Respondents to begin monthly field screening from the soil gas probes located on the western side of Dryden Road (across from GP-2). No additional sampling was conducted at Valley Asphalt Parcel 5054 Building 2 at 1903 Dryden Road because the property was demolished.

#### Month of October 2013:

On October 3, 10, 17, 24 and 31, 2013, EPA, Ohio EPA, START and the Respondents participated in conference calls regarding the status of VI mitigation activities.

On October 24, 2013, the Respondents completed 30-day hybrid proficiency sampling at Building 12, occupied by S&J Precision and Overstreet Painting, located at 2015/2019 Dryden Road. The Respondents collected 2 IA and 2 SS samples from the Overstreet Painting portion of Building 12, and 3 IA and 2 SS samples from the S&J Precision portion of Building 12. EPA collected independent SS samples from both portions of Building 12. The Respondents also completed normal proficiency sampling (ie, no SS sampling) in Building 9 (B&G Trucking - Building 2). The Respondents collected 2 IA samples as part of the 30-day proficiency sampling. EPA collected an independent SS sample from Building 9.

On October 28, 2013, the Respondents submitted the O&M Plan to Building 24 (Globe Equipment).

The Respondents continued weekly methane, carbon dioxide, oxygen, LEL, and PID readings from soil gas probe GP-2 and from SIM Trainer Parcel 5173 Building 1 at 2031 Dryden Road.

The Environmental Doctor to begin installing the SSDS at SIM Trainer (Building 15, located at 2031 Dryden Road) as soon as possible. The SSDS at the SIM Trainer building will be an intrinsically safe SSDS.

#### Month of November 2013:

On November 14 and 25, 2013, EPA, Ohio EPA, START and the Respondents participated in conference calls regarding the status of VI mitigation activities.

The Respondents reported that the 30-day proficiency IA sample results for Building 9 (B&G Trucking) were less than ODH IA screening levels. EPA independent SS sample results were less than ODH SS screening levels.

The Respondents reported that the 30-day hybrid proficiency SS sample results for Building 12 (Overstreet Painting and S&J Precision) were greater than ODH SS screening levels. TCE concentrations were observed as high as 7,000 ppbv. EPA independent SS sampling in Building 12 verified TCE concentrations greater than ODH SS screening levels. The Respondents to upgrade current SSDS in Building 12.

The Environmental Doctor began SSDS installation activities in Building 14 (Bullseye Amusements), Building 15 (SIM Trainer) and Building 17 (Former Alliance Equipment and Supply).

Month of December 2013:

On December 5, 12 and 19, 2013, EPA, Ohio EPA, START and the Respondents participated in conference calls regarding the status of VI mitigation activities.

The Environmental Doctor completed SSDS upgrade activities in Buildings 8 (B&G Trucking), Building 12 (Overstreet Painting and S&J Precision).

The Environmental Doctor completed SSDS installation activities in Building 14 (Bullseye Amusements) and Building 17 (Former Alliance Equipment and Supply).

The Respondents submitted a memo to EPA requesting that a SSDS not be installed in Building 16 (Command Roofing). The building is vacant with no electricity and the Respondents do not have any plans to occupy the building. EPA to work with local health department to determine a proper response.

Month of January 2014:

On January 2 and 9, 2013, EPA, Ohio EPA, START and the Respondents participated in conference calls regarding the status of VI mitigation activities.

The Respondents conducted hybrid proficiency sampling in Building 9 (B&G Trucking) on January 9th. The Environmental Doctor continued tweaking SSDS in Building 15 (SIM Trainer)

OU4 work (Valley Asphalt):

On July 10, 2013, an SSDS was installed in Building 4. One extraction point was installed in the building. Radius of influence testing was completed and proved that there is a vacuum reaching across the floor of the building. 30-day proficiency sampling was conducted and sampling results confirmed all proficiency samples collected were less than ODH screening levels.

Asbestos abatement activities were completed (by the Demo Dawgs) in Buildings 2 and 5.

From August 7 through 9, 2013, Buildings 1, 2, 5 and MP were demolished (by Cox Paving).

An Operation and Maintenance (O&M) Plan was submitted for Building 4.

On October 2, 2013, a representative of the owner from Building 7 signed a letter authorizing Valley Asphalt to demolish Building 7. The building will be demolished once all asbestos-containing material (ACM) is removed from the building.

On November 13, 2013, ACM abatement activities were completed in Building 7.

On November 21, 2013, Valley Asphalt demolished Building 7.

On December 18 and 19, 2013, 180-day proficiency air sampling was completed in Building 4. SS sampling results showed a TCE concentration of 14 ppbv, which is less than the ODH TCE SS screening level of 20 ppbv. TCE was not detected in the indoor air sample.

The next sampling event will occur in July 2014 (annual monitoring).

### 2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

There are two groups of PRPs at the SDDL Site conducting removal activities.

#### Operable Unit 3 (OU3)

Hobart Corporation  
NCR Corporation  
Kelsey Hayes Company  
(CRA is the environmental consultant)

#### Operable Unit 4 (OU4)

Valley Asphalt Corporation  
(Bowser-Morner is the environmental consultant)

### 2.1.4 Progress Metrics

<i><b>Waste Stream</b></i>	<i><b>Medium</b></i>	<i><b>Quantity</b></i>	<i><b>Manifest #</b></i>	<i><b>Treatment</b></i>	<i><b>Disposal</b></i>
N/A					

## 2.2 Planning Section

### 2.2.1 Anticipated Activities

See below in Section 2.2.1.1.

#### 2.2.1.1 Planned Response Activities

##### OU3 Planned Response Activities:

Building 8 (B&G Trucking, Bldg 1) - SSDS installed on 8/21/13. Environmental Doctor added additional stemlines in November 2013. Hybrid re-sampling to be completed on January 9, 2014.

Building 9 (B&G Trucking, Bldg 2) - SSDS installed on 9/30/13. 30-day proficiency sampling results all < screening levels. Next step is 180-day proficiency sampling.

Building 12 (Overstreet Painting and S&J Precision) - SSDS installed on 9/30/13. 30-day hybrid proficiency sampling results > screening levels. Additional stemlines installed in December 2013. Hybrid re-sampling to be completed on January 16, 2013. EPA to collect independent proficiency SS samples in both halves of the property.

Building 14 (Bullseye Amusements) - SSDS installed on 12/20/13. SSDS needs some upgrades and additional vacuum testing to be completed 2 weeks after system upgrades. Once vacuum readings are completed, proficiency air sampling will be scheduled.

Building 15 (SIM Trainer) - SSDS installed but not completed. SSDS being tweaked. Once completed, proficiency sampling will be scheduled.

Building 16 (Command Roofing) - The Respondents submitted a memo requested No Further Action. EPA and local health department to respond in January 2014.

Building 17 (Vacant) - SSDS installed on 12/20/13. Hybrid proficiency sampling to be completed on January 16, 2014. EPA to collect independent proficiency SS sample.

Building 24 (Globe Equipment) - SSDS installed 8/21/13. 180-day hybrid proficiency sampling to be



conducted March or April 2014.

OU4 Planned Activities:

Valley Asphalt to complete 1-year proficiency air sampling in July 2014.

### 2.2.1.2 Next Steps

See above in Section 2.2.1.1.

### 2.2.2 Issues

A completed exposure pathway exists for vapor intrusion, as TCE has been documented in the groundwater (TCE as high as 260 ppb), in the soil gas (TCE as high as 10,420 ppbv), in the sub-slab (TCE as high as 17,000 ppbv) and in the indoor air (TCE as high as 50 ppbv).

In addition, EPA has documented one non-residential property with a sub-slab methane level of 6.6%, which by definition is in the explosive range of 5%-15%.

## 2.3 Logistics Section

None.

## 2.4 Finance Section

### Estimated Costs \*

	Budgeted	Total To Date	Remaining	% Remaining
<b>Extramural Costs</b>				
START (Site Assessment) - Task 1868	\$58,000.00	\$57,907.00	\$93.00	0.16%
START (Initial OU3 oversight) - Task 1997	\$33,500.00	\$18,050.00	\$15,450.00	46.12%
START (OU3) - Task 2159	\$15,000.00	\$10,023.00	\$4,977.00	33.18%
START (OU4 - Valley) - Task 2219	\$15,000.00	\$5,751.00	\$9,249.00	61.66%
<b>Intramural Costs</b>				
USEPA - Direct	\$20,000.00	\$15,000.00	\$5,000.00	25.00%
<b>Total Site Costs</b>	<b>\$141,500.00</b>	<b>\$106,731.00</b>	<b>\$34,769.00</b>	<b>24.57%</b>

\* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

## 2.5 Other Command Staff

### 2.5.1 Safety Officer

Safety Plans have been completed under each PRP Work Plan.

### 2.5.2 Liaison Officer

City of Moraine Council was briefed by OSC Renninger on June 13, 2013 of the removal action progress.

### **2.5.3 Information Officer**

None.

## **3. Participating Entities**

### **3.1 Unified Command**

None.

### **3.2 Cooperating Agencies**

Ohio EPA  
RAPCA  
PHDMC  
Ohio Dept of Health

## **4. Personnel On Site**

EPA OSC - 1  
START (Weston Solutions/Dynamac) - 1

## **5. Definition of Terms**

No information available at this time.

## **6. Additional sources of information**

### **6.1 Internet location of additional information/report**

None.

### **6.2 Reporting Schedule**

POLREP 3 will be issued in March 2014.

## **7. Situational Reference Materials**

No information available at this time.





